

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
LIGHTSQUARED TECHNICAL WORKING	)	IB Docket 11-109
GROUP REPORT	)	

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in response to the Commission’s *Public Notice*, DA 11-1133, released June 30, 2011, seeking comments regarding a Report prepared by the LightSquared Technical Working Group to evaluate potential interference to Global Positioning System (“GPS”) operations and associated devices.

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. Most APCO members are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO is the largest FCC-certified frequency coordinator for Part 90, Public Safety Pool channels, and appears regularly before the Commission on a wide range of public safety communications issues.

Many public safety agencies operate emergency communications on simulcast, trunked radio systems that depend upon GPS timing devices. Public safety personnel also increasingly rely upon a variety of GPS-enabled devices to locate vehicles, personnel, and emergency locations. Therefore, APCO has been monitoring the LightSquared deployment plan with a concern that it could interfere with public safety and other critical GPS-related operations.

The Technical Working Group Report demonstrates that LightSquared's deployment, as originally announced, would cause severe interference to a wide range of GPS devices. Thus, LightSquared has stated that it will scale back its initial deployment to avoid use of the 10 MHz of spectrum immediately adjacent to GPS. However, the overwhelming evidence of interference presented in the Working Group Report suggests that *further* testing must be conducted to verify that this modified deployment will not in fact cause interference. Such additional testing should be conducted in a timely manner, but with sufficient opportunity for a thorough study and analysis with full participation from all interested parties. Tests must also include the full range of GPS and GPS-enabled devices used by public safety and other critical users across public and private sectors.

Even if additional test results verify that LightSquared's modified deployment plan will not cause interference, the FCC should limit LightSquared's authorization to specific parameters necessary to limit LightSquared to that level of deployment. LightSquared should not be permitted to expand operations in the future in a manner that may cause dangerous interference to GPS. Any future expansion, whether through higher power levels or use of spectrum closer to GPS allocations, should be prohibited, absent thorough and publicly-vetted tests to ensure interference-free operation. The Commission should also explore the potential for adopting a guard band to protect GPS operations from harmful interference.

## CONCLUSION

Therefore, for the reasons stated above and in the Working Group Report, further tests are necessary to verify that neither LightSquared's modified deployment plan nor any future expanded deployment will interfere with public safety or other critical uses of GPS.

Respectfully submitted,

/s/

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